

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

SUSAN SCHAEFER-LAROSE, on behalf)	
of herself and others similarly situated,)	
WILLIAM WANROOY,)	
)	
Plaintiffs,)	Cause No. 1:07-cv-01133-SEB-TAB
)	
v.)	
)	
ELI LILLY and COMPANY,)	
)	
Defendant.)	

DECLARATION OF ANGELA M. WHITE

I, Angela M. White, declare under penalty of perjury as follows:

1. I have worked for Eli Lilly and Company ("Lilly") in the litigation support group for approximately 11 years. I currently serve as the Team Leader for Lilly's Litigation Case Management Team.
2. This declaration is based on my personal knowledge and experience working in the litigation support group. I have also reviewed Lilly's 10k to familiarize myself with information reflected there regarding various litigation matters. A copy of the 10k is attached hereto as Exhibit A.
3. Lilly has been involved with literally thousands of lawsuits, arbitrations, and other legal proceedings. For example, as reported in the 10k, Lilly has been involved in more than 30,000 claims involving Zyprexa alone.
4. During the past five years, more than 25 people have worked in Lilly's litigation group. I do not have personal knowledge of all the positions taken in all of the legal proceedings in which Lilly has been involved, and I know of no one at Lilly with such knowledge.

5. During the past five years, Lilly has worked with hundreds of outside lawyers on various matters. Lilly relies on its outside counsel to maintain files of pleadings, discovery materials and transcripts for its legal proceedings. Lilly does not maintain a central repository of such materials and, therefore, has no automated means to review them for either its pending or prior litigation matters.

6. Compiling information about positions Lilly has taken in legal proceedings unrelated to this matter would require Lilly's counsel, at numerous law firms throughout the United States, to inspect and analyze every proceeding with which Lilly has been involved to determine whether or not there might be information potentially responsive to Plaintiff's 30(b)(6) Request No. 26 in this matter.

7. To present a witness to testify about positions Lilly has taken in prior legal proceedings would require Lilly to assimilate and cull through a vast amount of information, located at different physical locations, and then, potentially, prepare a witness to testify about numerous unrelated matters. This process would require an extensive amount of work by Lilly's current and prior litigation counsel throughout the United States.

8. I declare under penalty of perjury that the foregoing is true and correct. Executed on this 27th day of June, 2008.

Angela M. White
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